

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

HOLLIS MORRISON GREENLAW (01)
BENJAMIN LEE WISSINK (02)
CARA DELIN OBERT (03)
JEFFREY BRANDON JESTER (04)

Case No. 4:21-cr-289-O-3

**CARA OBERT’S MOTION FOR LEAVE TO FILE
MOTION UNDER RULE 29 IN EXCESS OF PAGE LIMIT**

Pursuant to Local Criminal Rule 47.2(c), Cara Obert respectfully requests leave to exceed the 25-page limitation for her Motion for Judgment of Acquittal under Federal Rule of Criminal Procedure 29 (“Rule 29 Motion”). Ms. Obert respectfully seeks 30 pages for her Rule 29 Motion. The government does not oppose this request. Under this Court’s Local Rules, parties may seek leave to exceed the 25-page limitation for “extraordinary and compelling reasons.” *See* N.D. Tex. Crim. L.R. 47.2(c). Such reasons exist here.

Specifically, Ms. Obert requires the additional pages for her Rule 29 Motion to fully address the grounds for a judgment of acquittal. The need for these additional pages is due to the extensive trial record and the complexities of the issues that arose from crimes charged in this case. The indictment charged Ms. Obert in a ten count indictment, including one count of conspiracy to commit wire fraud, one count of conspiracy to commit securities fraud, and eight counts of substantive securities fraud. Each of the charges covered a time frame of nearly five years and involved numerous complex financial transactions and accounting issues. Additionally, the evidence consists of testimony from 48 witnesses, including four expert witnesses, and includes

thousands of admitted exhibits. Thus, exceeding the normal 25-page limitation is necessary for Ms. Obert to adequately address all of the legal and factual issues for the Court.

Ms. Obert's counsel has consulted with the government, and they do not oppose this request.

For these reasons, Ms. Obert respectfully requests that the Court grant her leave to exceed the page limit for her Rule 29 Motion.

Dated: February 2, 2022

Respectfully submitted,

By: /s/ Neal Stephens

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CERTIFICATE OF CONFERENCE

Pursuant to Local Criminal Rule 47.1, on February 3, 2022, I conferred with Assistant United States Attorney Tiffany Eggers via email regarding the instant motion and the United States of America does not oppose the motion.

/s/ Neal Stephens

Neal Stephens